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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. **2011-958**

11 **REYNALDO MAGNO CORRALES, JR.**
12 **4817 N. Candish Avenue**
13 **Covina, CA 91724**

A C C U S A T I O N

14 **Registered Nurse License No. 594326**

15 Respondent.

16 Complainant alleges:

17 **PARTIES**

18 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
19 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
20 Consumer Affairs.

21 2. On or about February 6, 2002, the Board of Registered Nursing issued Registered
22 Nurse License Number 594326 to Reynaldo Magno Corrales, Jr. (Respondent). The Registered
23 Nurse License was in full force and effect at all times relevant to the charges brought herein and
24 will expire on November 30, 2011, unless renewed.

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JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 726 of the Code states:

"The commission of any act of sexual abuse, misconduct, or relations with a patient, client, or customer constitutes unprofessional conduct and grounds for disciplinary action for any person licensed under this division, under any initiative act referred to in this division and under Chapter 17 (commencing with Section 9000) of Division 3.

This section shall not apply to sexual contact between a physician and surgeon and his or her spouse or person in an equivalent domestic relationship when that physician and surgeon provides medical treatment, other than psychotherapeutic treatment, to his or her spouse or person in an equivalent domestic relationship."

5. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

6. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct . . ."

"(d) Violating or attempting to violate, directly or indirectly . . . or conspiring to violate any provision or term of this chapter or regulations adopted pursuant to it."

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1 to give him her telephone number, he told her he would get it from the computer. Respondent
2 asked if he could rub crème on her stomach, and Patient D.P. said no. He asked to see her panties
3 again, and she said no. Respondent told an assistant to leave the patient's hospital room and do
4 errands, and asked her if he could sleep next to her in the chair by her bed. The patient told him
5 to use the employee lounge. During the night of May 11, 2009, Respondent gave the patient a lot
6 of Dilaudid because she was in severe pain. More than once, Respondent gave the patient jello,
7 even though she was not supposed to have anything by mouth. In the morning of May 12, 2009,
8 Respondent came to say goodbye to Patient D.P., leaned over and hugged her, and asked "Can I
9 kiss you?". She said absolutely not.

10 13. Respondent admitted that he asked Patient D.P. if her panties were from Victoria's
11 Secret, and that he fed her jello and water, which was contrary to the doctor's "NPO" order
12 (nothing by orem/mouth). Respondent's conduct towards Patient D.P. was unwelcome,
13 unprofessional, inappropriate, offensive, and degrading.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Unprofessional Conduct)**

16 14. Respondent is subject to disciplinary action under Code sections 726 and 2761,
17 subdivision (a) for unprofessional conduct in that he acted unprofessionally, as follows:

18 15. As set forth above in Paragraphs 9-13, which are incorporated by reference in full,
19 Respondent's comments and actions towards Patient D.P. were unprofessional, offensive and
20 inappropriate.

21 16. Respondent blatantly disregarded a physician's orders twice, by giving a patient jello
22 against the doctor's order, which could have seriously jeopardized the patient's condition. This
23 violated Kaiser's policies and procedures and the Nursing Practice Act. Additionally,
24 Respondent's failure to document that he had administered food to Patient D.P., who had an
25 "NPO" order at the time, violated Kaiser's policies and procedures.

26 17. Furthermore, Respondent engaged in unprofessional conduct by acting
27 inappropriately towards one of his co-workers. Co-worker Y.F. was a female Certified Nursing
28 Assistant (CNA) at Kaiser, who worked in the Medical-Surgery and Telemetry Unit, and

1 provided clinical assistance to the registered nurses. Co-worker Y.F. met Respondent on or
2 around January, 2008. Around December of 2008, Respondent began to make comments about
3 her appearance, and hinted that they should "get together". In February, 2009, Respondent began
4 to stare at Co-Worker Y.F. for long periods and asked her out on dates. She told him that she was
5 married, but he persisted by asking for her telephone number.

6 18. In or about May, 2009, Respondent continued to make advances towards Coworker
7 Y.F., who told him to leave her alone because she was married and that if he did not stop, she
8 would report him. Respondent asked her to go to his house on more than one occasion.
9 Respondent also handed her his cell phone, which had a photo of a penis, and said "I'll show you
10 mine if you show me yours." Respondent claimed it was a photo of his penis, and bragged by
11 saying it was "big." She threw the cell phone at him and told him to go away. Respondent began
12 following Coworker Y.F. around while she was carrying out her rounds.

13 19. On or about June 15, 2009, at around 6:00 a.m., Respondent asked Coworker Y.F. to
14 help him with a compression boot in a patient's room. When she walked into the patient's room,
15 which was dark, Respondent closed the door and curtain. He grabbed and pushed her into the
16 restroom, tried to hug and kiss her, and told her he wanted to "_____" her. She asked
17 Respondent to stop, but he exposed his penis, forced her to touch it, and also groped her buttocks
18 and her breast. He rubbed his penis with both of his hands, and ejaculated soon afterwards. Co-
19 worker Y.F. reported Respondent's behavior to Kaiser personnel the following morning.

20 20. Complainant refers to and incorporates all the allegations contained in Paragraphs 1-
21 13, as though set forth fully.

22 **THIRD CAUSE FOR DISCIPLINE**

23 **(Violation of the Nursing Practice Act)**

24 21. Respondent is subject to disciplinary action under Code sections 726 and 2761,
25 subdivision (d), on the grounds of unprofessional conduct, in that Respondent violated and/or
26 attempted to violate, directly or indirectly the provisions of the Nursing Practice Act.
27 Complainant refers to, and by this reference incorporates fully, the allegations set forth above in
28 Paragraphs 1-19.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

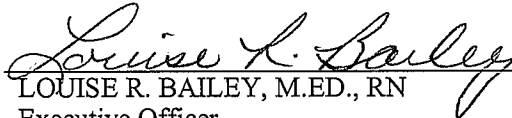
1. Revoking or suspending Registered Nurse License Number 594326, issued to Reynaldo Magno Corrales, Jr.;

2. Ordering Reynaldo Magno Corrales, Jr. to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

3. Taking such other and further action as deemed necessary and proper.

DATED: _____

6/1/11



LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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